

# **Exhibit I**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

PFLAG, INC.; *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States; *et al.*,

*Defendants.*

Civil Action No.

**DECLARATION OF RACHEL ROE**

I, Rachel Roe,<sup>1</sup> pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Rachel Roe. I am a Plaintiff in this action. I offer this Declaration in support of Plaintiffs' Motion for Temporary Restraining Order. I am over 18 years old, have personal knowledge of the facts set forth in this Declaration and would testify competently to those facts if called as a witness.

2. I am a Plaintiff in this action. I am bringing claims on behalf of myself and as the parent and next friend of my son, Robert Roe.

3. Along with my husband, I am the parent of Robert Roe, my 16-year-old son, and Robert's three siblings. We live in Massachusetts. My husband and I adopted all four of our

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<sup>1</sup> Rachel Roe and Robert Roe are pseudonyms. My family is proceeding under pseudonym to protect our right to privacy and ourselves from discrimination, harassment, and violence, as well as retaliation for seeking to protect our rights.

children after serving as their foster parents. Because of his adoption, Robert is eligible for health insurance through MassHealth until he turns 26.

4. We are members of PFLAG.

5. My son, Robert, is an incredible teenager. He is smart, active, and very involved in his school and community. He is an honors student carrying a vigorous academic load. He is very talented at sports. He started for his high school's varsity team as a freshman, and is a leader on the team. He has also won a state championship in one sport and been selected for All-Star teams.

6. Robert is transgender. He was assigned a female sex at birth, but I knew from a very early age that he did not identify as a girl. Robert started to express his gender identity as early as two years old. He would regularly dress up in dragon costumes to avoid having to wear girls' clothes.

7. Robert began his social transition at age eight. He received a gender dysphoria diagnosis at the age of nine. Robert's primary care physician referred us to GeMS.

8. Robert has been receiving medical care from the Gender Multispecialty Services (GeMS) at Boston Children's Hospital for several years. We first met with a team of doctors who were able to explain how puberty-delaying medications and hormone replacement therapy work, and who also thoroughly explained the risks and benefits associated with both medications in transgender adolescents. He received a puberty-blocking implant at age 11 at GeMS, and he started receiving hormone therapy (testosterone) at age 14 at GeMS. His providers at GeMS have confirmed that, as he grows into adulthood, Robert will not require chest masculinization surgery (referred to as "top surgery," surgical care to remove breast tissue) because his puberty-blocking implant prevented the growth of breast tissue.

9. Robert has the freedom to be himself because of the medical care that he has been able to receive as a young person. He is healthy, social, and thriving. While some close friends know that he is transgender, most people do not, and it remains his choice who he decides to tell.

10. On January 28, 2025, the White House issued an Executive Order entitled “Protecting Children from Chemical and Surgical Mutilation” (“Executive Order”).

11. Robert had an appointment scheduled at GeMS for Wednesday, January 29, 2025. This appointment was supposed to be a routine check-up regarding Robert’s hormone therapy: he would get bloodwork done, his providers would confirm that he was receiving the correct level of testosterone or adjust his dosage if necessary, and that would be it.

12. But that morning, a Nurse Practitioner whom we had seen at GeMS called me and told me that, because of the Executive Order, the appointment was canceled, and GeMS were canceling all of their appointments for people under age 19 as of that morning.

13. Without testosterone, I am fearful that Robert will experience significant distress and anxiety. He has never undergone an endogenous female puberty because of the blockers; he has only ever developed and lived life as a boy. He needs testosterone to continue to live his life.

14. When the Nurse Practitioner from GeMS called me the morning of January 29 to tell me that they were canceling Robert's appointment, Robert was silent. Since then, Robert has been worried that he may not be able to continue his care.

15. I am devastated that the President has sought to prevent my child from accessing the health care that allows him to be his true self. Because the Executive Order has caused GeMS and other providers to halt the provision of essential medical care, I do not know how else to get Robert the care he needs.

16. The health and safety of my children is more important to me than anything else. I have watched Robert become a successful, involved, and happy young man, and I am scared of what will happen to his confidence and happiness if he cannot access the care he needs.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge and belief.

Dated this \_\_ day of February 2025.

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Rachel Roe

I declare under penalty of perjury that the foregoing is true to the best of my knowledge and belief.

Dated this 2nd day of February 2025.

Rachel Roe

Rachel Roe